

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF JOINT SUBMISSION
RE: GOOGLE'S RFA AND
INTERROGATORY RESPONSES**

Judge: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal Portions of the Joint Submission Re: Google’s RFA and
8 Interrogatory Responses (“Joint Submission”). In making this request, Google has carefully
9 considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.
10 Google makes this request with the good faith belief that the information sought to be sealed consists
11 of Google’s confidential and proprietary information and that public disclosure could cause
12 competitive harm.

13 3. Google requests the Court seal the materials highlighted in the Joint Letter Brief and
14 Exhibit A attached thereto.

15 4. The materials identified all comprise confidential and proprietary information as the
16 materials involve highly sensitive features of Google’s internal systems and operations that Google
17 does not share publicly and maintains as confidential in the ordinary course of its business and is
18 not generally known to the public or Google’s competitors. Specifically, this information provides
19 details related to various types of Google’s internal project, data signals, and logs and their
20 proprietary functionalities, as well as internal metrics and investigation into financial impact of
21 certain features. Such information reveals Google’s internal strategies, system designs, and business
22 practices for operating and maintaining many of its important services while complying with legal
23 and privacy obligations.

24 5. Public disclosure of the identified information would harm Google’s competitive
25 standing it has earned through years of innovation and careful deliberation, by revealing sensitive
26 aspects of Google’s proprietary systems, strategies, and designs to Google’s competitors, allowing
27 them to alter their own plans for product development and/or commercialization, time strategic
28 litigation, focus their patent prosecution strategies, or otherwise unfairly compete with Google.

